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CHEVRON U.S.A. INC.,
9 a Pennsylvania corporation

11 UNITED STATES DISTRICT COURT

12 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

13 MARK SNOOKAL, an individual,

14 Plaintiff,

15 vs.

16 CHEVRON USA, INC., a California Corporation,
and DOES 1 through 10, inclusive,

17 Defendants.

Case No. 2:23-cv-6302-HDV-AJR

**JOINT APPENDIX OF DECLARATIONS
AND WRITTEN EVIDENCE RE
DEFENDANT CHEVRON U.S.A. INC.'S
MOTION FOR SUMMARY JUDGMENT
OR, IN THE ALTERNATIVE, PARTIAL
SUMMARY JUDGMENT**

*[Filed concurrently with Notice of Motion; Joint
Brief re Defendant's Motion for Summary
Judgment; Defendant's Statement of
Uncontroverted Facts and Genuine Disputes;
and [Proposed] Judgment granting Defendant's
Motion for Summary Judgment]*

Hearing: December 5, 2024
Time: 10:00 a.m.
Place: Courtroom 5B – 5th Floor
Judge: Hon. Hernán D. Vera

Action Filed: August 3, 2023
Trial Date: February 4, 2025

JOINT APPENDIX OF DECLARATIONS AND WRITTEN EVIDENCE

Exhibit No.	Party	Description
	Defendant	Declaration of Cotey Cswaykus
	Defendant	Declaration of Dr. Scott Levy
A	Defendant	MSEA Location Clusters Table
B	Defendant	August 23, 2019 Email from Dr. Khan re Plaintiff's heart condition
	Defendant	Declaration of Dr. Eshiofe Asekomeh
C	Defendant	Expatriate Exam Recommendations
	Defendant	Declaration of Andrew Powers
D	Defendant	Chevron U.S.A.'s Equal Employment Opportunity Policy (HR Policy 400)
	Defendant	Declaration of Robert E. Mussig
E	Defendant	Excerpts from the Transcript of Plaintiff's Deposition, taken on May 10, 2024
E-1	Defendant	Plaintiff's Expatriate Assignment Offer
E-3	Defendant	Medical Suitability for Expatriate Assignment History & Physical Examination
E-4	Defendant	July 29, 2019 doctor's note
E-5	Defendant	Expatriate Exam Recommendations
E-6	Defendant	August 29, 2019 email from S. Levy re Patient MS
E-7	Defendant	September 16, 2019 email from S. Levy re medical
E-8	Defendant	September 6, 2019 email from A. Powers re Rescinded Job Offer in Nigeria
E-10	Defendant	September 5, 2019 email from A. Ruppert re Positions in 2H PDC
E-12	Defendant	Job Description for El Segundo Operating Assistant
E-13	Defendant	Job Description for El Segundo Routine Maintenance General Team Lead
E-17	Defendant	Plaintiff's resignation letter
E-18	Defendant	Plaintiff's termination paperwork

Exhibit No.	Party	Description
E-19	Defendant	Plaintiff's Exit Interview
	Defendant	Declaration of Sarah Fan
F	Defendant	Excerpts from the Transcript of Dr. Eshiofe Asekomeh's Deposition, taken on October 10, 2024
	Plaintiff	Declaration of Plaintiff Mark Snookal
1	Plaintiff	July 1, 2019 "Assignment Offer" letter
2	Plaintiff	July 24, 2019 MSEA exam of Mr. Snookal completed by Dr. Sobel
3	Plaintiff	July 29, 2019 letter from Dr. S. Khan Re: Mr. Snookal
4	Plaintiff	August 15, 2019 "Expatriate Exam Recommendations"
5	Plaintiff	August 23, 2019 and August 26, 2019 email thread between Dr. Khan and Dr. Levy Re: Mr. Snookal
6	Plaintiff	September 4, 2019 through September 6, 2019 email thread regarding Mark Snookal's disability discrimination complaint
7	Plaintiff	Chevron's "Physical Requirements and Working Conditions GO-308" for the REM Position
8	Plaintiff	September 16, 2019 email from Dr. Levy to Mr. Snookal
9	Plaintiff	August 4, 2021 letter of resignation from Mark Snookal
10	Plaintiff	"Voluntary Termination" Paperwork
	Plaintiff	Declaration of Dr. Alexander Marmureanu
11	Plaintiff	Expert Report of Dr. Alexander Marmureanu
	Plaintiff	Declaration of Olivia Flechsig
12	Plaintiff	Excerpts from the Transcript of Scott Levy, M.D.'s Deposition, taken on August 30, 2024
12-C	Plaintiff	August 23, 2019 E-mail from Dr. Khan to Dr. Levy
12-D	Plaintiff	September 16, 2019 E-mail from Dr. Levy to Mr. Snookal
12-E	Plaintiff	Expatriate Assignment History & Physical Examination Form for REM Position
	Plaintiff	Declaration of Dolores Y. Leal

Exhibit No.	Party	Description
13	Plaintiff	Excerpts from the Transcript of Plaintiff Mark Snookal's Deposition, taken on May 10, 2024
14	Plaintiff	Excerpts from the Transcript of Andrew Powers Deposition, taken on September 17, 2024
14-3	Plaintiff	September 4, 2019 Email from Mark Snookal to Human Resources Manager Andrew Powers
14-5	Plaintiff	Andrew Powers Email to Mark Snookal Re: Medical Team Findings
14-12	Plaintiff	Email from Andrew Powers to medical team in Nigeria
15	Plaintiff	Excerpts from the Transcript of Dr. Eshiofe Asekomeh's Deposition, taken on October 10, 2024
15-2	Plaintiff	Job Description for NMA EGTL Reliability Engineering Manager
15-7	Plaintiff	Dr. Asekomeh email thread with Nigerian cardiologists regarding Mark Snookal's medical report
16	Plaintiff	Excerpts from the Transcript of Thalia Tse's Deposition, taken on September 13, 2024
17	Plaintiff	Andrew Powers' September 6, 2019 Email to Mark Snookal Re: Disability Complaint Findings

Dated: October 24, 2024

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By /s/ Sarah Fan

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